



September 30, 2005

Mr. Amin Yazdanian
Maryland Department of the Environment
Hazardous Waste Department
1800 Washington Blvd.
Suite 645
Baltimore, MD 21230

RE: Post Closure Permit Renewal Application, Controlled Hazardous Substance Permit A-302, Former Safety-Kleen Service Center, 12164 Tech Road, Silver Spring, Maryland

Dear Mr. Yazdanian:

Safety-Kleen Systems, Inc. (S-K) formerly operated a Service Center at 12164 Tech Road, Silver Spring, Maryland. Post-closure activities have been conducted for the past five years under the existing Controlled Hazardous Substances Permit A-302. As required by COMAR 26.13.07.02-E, two copies of the enclosed Permit Renewal Application are being submitted to the Maryland Department of the Environment (MDE) at least 180 days prior to the effective permit expiration (January 31, 2006). On July 28, 2005, S-K and MDE discussed the permit renewal application. Based on the discussion, MDE approved a 60-day extension for submittal of the application. In compliance with COMAR 26.13.07.02-D, a duplicate application has been submitted at the same time to the USEPA.

The renewal application is proposing some modifications to the corrective action program. These modifications are summarized briefly below, and a red-lined version of the existing permit has also been included in this submittal as supporting documentation.

1) Discontinuation of the Soil Vapor Extraction (SVE) System Operation:

As previously discussed with MDE and as presented in the quarterly progress reports, the soil vapor extraction (SVE) system has achieved asymptotic recovery rates of removal, after recovering over 1,800 pounds of total petroleum hydrocarbons (TPH). The system has been pulsed to test for possible vapor rebound over the past year, and no concentrations have been detected in the extracted vapors. The SVE system has been highly successful in removing TPH impacts at the site, as evidenced by the significant reduction in TPH in groundwater in the site wells (e.g., from 318 mg/L to 0.16 mg/L in Well MW-1). Further operation of the system is not substantiated based on the results of the pulsing. All references to any future operation or maintenance of the system have therefore been removed from the draft permit. Upon approval, the vapor monitoring wells will continue to be used as monitoring points, but the SVE system will be decommissioned.

2) Modification of Constituent List in Groundwater Protection Standards:

Based on the last 16 years of groundwater monitoring data, S-K has demonstrated that the site has attained the prescribed groundwater protection standards for at least three consecutive years in all on and off site wells for all of the following constituents: toluene, ethylbenzene, xylenes, chlorobenzene, 1,2-dichlorobenzene, 1,4-dichlorobenzene, chloroform, 1,1-dichloroethene, methyl ethyl ketone, and 1,1,1-trichloroethane. Pursuant to the conditions of the existing permit, S-K proposes to remove these parameters from the permit, and only analyze groundwater for select VOCs, SVOCs, metals, and TPH. S-K also is also proposing to conduct groundwater monitoring and reporting on a semiannual basis. As discussed with the MDE, future modifications to the sampling frequency and the constituent list would be possible through written concurrence with MDE, rather than a formal permit modification.

3) Modification of the Permit Language to Allow Alternative Technology Evaluation and/or Justification of Alternative Cleanup Groundwater Standards via a Risk Assessment:


The only constituent at the S-K site that has not achieved the permit-specified concentration limit is TPH in groundwater. As you are aware, S-K conducted a voluntary chemical oxidation pilot test to determine if the technology could address the residual concentrations of TPH in groundwater. Although initial post-injection sampling results were favorable, TPH concentrations have subsequently rebounded, and TPH is again present above the permit limit of 100 ppb in four on-site wells. Gaining Department approval for that voluntary chemical oxidation pilot test proved cumbersome within the context of the current Post Closure Permit. S-K may in the future attempt other alternate remedial technologies, if deemed feasible. Therefore, S-K has proposed permit language to facilitate a flexible and expeditious approval process for these activities

S-K is aware that the adjacent IFI facility is pursuing a risk assessment to address residual PCE impacts up-gradient from the S-K facility, as documented in the Analysis of Interim Shutdown Data, International Fabricare Institute Facility, Silver Spring, Maryland (Reference # MD752.0102) submitted on March 16, 2005 and prepared by Arcadis G&M, Inc. In this report, Arcadis concluded that the current groundwater concentrations up-gradient of S-K do not pose an unacceptable current or future risk to human health and the environment. However, the most recent groundwater data from the IFI facility (January 2004) shows PCE from several IFI wells (GM-1, SCS-1A and SCS-1B) at concentrations approximately twice as high as the highest recorded PCE concentration ever detected on the S-K property (360 ppb in S-K well MW-7 in July 2002 vs. 650 ppb in IFI well GM-1, 725 ppb in IFI well SCS-1A, and 609 ppb in IFI well SCS-1B in January 2004). Given the relatively low groundwater concentrations at the S-K site relative to those at the IFI facility, S-K believes a similar risk-based demonstration is appropriate to address the remaining concentrations in groundwater at the former S-K facility. A proposal for the risk based demonstration will be submitted to the MDE subsequent to the submittal of this draft permit application. This evaluation will be developed utilizing the criteria established in the MDE Guidance Document: "Cleanup Standards for Soil and Groundwater", dated August 1, 2001.

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S-K appreciates the assistance that the MDE has provided in completion of this project. If you have any questions regarding the enclosed permit application, please feel free to contact me at (770) 418-1860 or Sara Brothers (Trihydro Corporation) at (505) 341-0476.

Sincerely,
Safety-Kleen Systems, Inc.



Gerhard L. Risse, P.E.
Senior Project Manager, -Engineering

198-002-005

cc: Jay Lanahan (S-K, Manassas, VA)
Baruch Onyekwelu (MDE)
US EPA Region Contact
Trihydro Corporation